

Plaintiffs' Supplemental Exhibit 105

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

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IN RE: FACEBOOK, INC.,
CONSUMER PRIVACY USER
PROFILE LITIGATION

MDL No. 2843

Case No. 18-md-02843-VC-JSC

This document relates to:

ALL ACTIONS

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REMOTE VIDEOTAPED DEPOSITION OF
SIMON CROSS
30(B)(6) DESIGNEE, FACEBOOK, INC.

MONDAY, MAY 9, 2022

REPORTED BY: HOLLY THUMAN, CSR No. 6834, RMR, CRR
JOB NUMBER 5210141

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Remote videotaped deposition of SIMON CROSS, taken by the Plaintiffs, with the witness located in London, United Kingdom, commencing at 3:49 P.M. London Daylight Time, on MONDAY, MAY 9, 2022, before me, HOLLY THUMAN, CSR, RMR, CRR.

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1 to allow a user to choose whether or not an 18:22:01
2 application had access to their data. 18:22:10
3 BY MR. LOESER: 18:22:14
4 Q. All right. We've talked a bit about 18:22:20
5 the -- I'm sorry, go ahead. 18:22:22
6 A. Sorry. Carry on. 18:22:25
7 Q. Okay. So moving on, the -- I've asked you 18:22:26
8 some questions about the different permissions, and 18:22:28
9 you've provided some helpful information about the 18:22:31
10 terminology used to discuss different permissions. 18:22:33
11 I do want to make sure I have a complete 18:22:37
12 understanding of all of the different permissions 18:22:40
13 that allowed access to friend information. 18:22:44
14 And I asked before if a number of the 18:22:48
15 permissions had the word "friends" in them, and you 18:22:52
16 said "Yes." 18:22:56
17 And it's also the case the number of 18:22:57
18 permissions that provided access to friend 18:22:59
19 information did not have the word "friend" in them. 18:23:02
20 Is that right? 18:23:05
21 A. There were permissions that allowed an app 18:23:08
22 to access information about a user and that user's 18:23:11
23 friends that didn't have "friend" in the title. 18:23:17
24 Q. Okay. And I'm going to run through some, 18:23:22
25 and then you can help me understand if there are 18:23:24

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1 Q. Okay. And so if you go back to the first 03:47:33
2 page of the document, there's a number of people
3 identified here. One is KP, and we've talked a bit
4 about him.

5 But -- but what his -- what was his 03:47:46
6 position, if you know, at this time at Facebook?

7 A. I wouldn't want to give like a perfectly
8 authoritative answer.

9 My understanding is he was a strategic
10 partner manager. 03:47:59

11 Q. Okay. And what -- and what about
12 Ime Archibong?

13 A. Again, I don't want to be -- don't have
14 an authoritative answer to his job title at the
15 time. But my understanding is he was the manager 03:48:09
16 of the strategic partnerships team.

17 Q. Okay. And Jackie Chang?

18 A. Similarly, I'm sure I have the
19 authoritative answer, but my understanding is she
20 was a strategic partner manager on the strategic -- 03:48:26
21 on the platform partnerships team.

22 Q. And Chris Daniels?

23 A. Chris Daniels, again, don't want to give
24 an authoritative answer.

25 My recollection, though, is that he was 03:48:40

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1 the head of business development. 03:48:41

2 Q. Okay. So now if we go to the -- the
3 beginning of the string, if you look at the email
4 that Jackie Chang wrote to Ime and Chris.

5 Do you see that towards the bottom of the 03:48:58
6 string?

7 A. I do.

8 Q. And the -- the subject line isn't evident
9 on that. But if you go up to the email above that
10 from Ime, the subject is "Re: T0/Special Cases for 03:49:12
11 P3 consideration."

12 What is -- do you know what T0 refers to
13 here?

14 A. T0 refers to some partner classification
15 that -- that seems to have been in use at the time. 03:49:29

16 Q. Okay. And having looked through this
17 email, this is a discussion of the changes to the
18 Facebook platform that would deprecate certain
19 APIs, including friend permissions; is that right?

20 MR. DAVIS: Objection. Form. 03:49:53

21 THE DEPONENT: My understanding is this
22 is an email thread discussing potential impact of
23 the -- several changes to the API that were being
24 considered at the -- at the time of this email
25 being written. 03:50:12

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1 Q. (By Mr. Loeser) Okay. And looking at 03:50:13
2 the Jackie Chang's message, at the beginning of
3 this thread, she states "Working with KP to further
4 synthesize P3 impact by breaking out T0 partners
5 with non-standard agreements and specific 03:50:26
6 categories of impact that we should address. KP is
7 working on the pulling the same analysis of the
8 friend data, but we're also working in parallel to
9 parse out key partnerships/scenarios that we should
10 be solving for." 03:50:38

11 Do you see that?

12 A. I see that.

13 Q. So what Jackie Chang is sorting out here
14 is, among other things, which partners would lose
15 access to friend permissions and which ones would 03:50:50
16 not, right?

17 A. Jackie Chang is not making any decisions
18 in this email. What you see here is a conversation
19 between a number of people on the partnerships team
20 attempting to react to a set of potential changes 03:51:09
21 and how they might impact the partner ecosystem.

22 Q. Okay. And Jackie Chang is -- is helping
23 to develop a format for how to decide which
24 partners would have access to friend data, for
25 example, and which ones would not, right? 03:51:28

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1 MR. DAVIS: Objection. Form. 03:51:36

2 THE DEPONENT: This is a group of people

3 attempting to put together their -- their best

4 guess at a framework. But there's nothing that

5 indicates that this was what was ultimately 03:51:49

6 implemented.

7 Q. (By Mr. Loeser) Okay. And -- by the

8 way, if you -- in this document, did you see that

9 link there, https, and then there's a long URL?

10 A. I do. 03:52:06

11 Q. Okay. How -- how would that work? If

12 someone sent you this email at Facebook, is -- is

13 that -- if there's a link in a document, it would

14 be something you could click on and you'd then see

15 the document? 03:52:18

16 A. My understanding is that this is a --

17 some form of online document system, yes.

18 Q. So in -- in Ms. Chang's email to Ime and

19 Chris, she provides a -- some recommendations for

20 how to bucket different partners in this analysis; 03:52:41

21 is that right?

22 A. It's hard to confirm what she -- what

23 she's doing here without seeing the original

24 document.

25 She's referring to -- to tabs, for sure. 03:53:00

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1 But hard to know what -- what was on those tabs and 03:53:03
2 how that relates to what's in the email.

3 Q. So to fully understand this document, you
4 would need the document that is hyperlinked in this
5 email; is that what you're saying? 03:53:14

6 MR. DAVIS: Object to the form.

7 THE DEPONENT: There's references in the
8 email to information in -- in -- in a document,
9 which I don't have the ability to see as of now.

10 Q. (By Mr. Loeser) And would it help you 03:53:31
11 understand the context of this email, if you had
12 the ability to see that document?

13 MR. DAVIS: Object to the form.

14 THE DEPONENT: Potentially --
15 potentially. It would depend on the contents of -- 03:53:42
16 of the -- the document. But it also depends on
17 the -- the question you're asking.

18 Q. (By Mr. Loeser) And do you recall
19 Ms. Chang being involved in this process of coming
20 up with a format to bucket different groups of 03:53:59
21 partners?

22 A. Jackie Chang was on the partnerships
23 team, as was I. And I, yes, recall that a number
24 of people were involved in attempting to assess the
25 proposed changes. 03:54:18

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1 Q. And if you go to the first heading in -- 03:54:21
2 in her email, under the hyperlink, it says "T0
3 Tab."

4 And you're saying you don't recall what
5 category of partners would fall under the T0 tab? 03:54:34

6 A. I don't recall what category of partners
7 would fall under -- under T0.

8 Q. Okay. Now, it looks like that under this
9 category, T0, there are three different
10 considerations that she -- that Jackie Chang 03:54:56
11 identifies. The first is "Partners with
12 non-standard agreement and their backward
13 compatibility clause."

14 Can you explain what that means?

15 A. I would be speculating as to -- as to 03:55:09
16 exactly what that meant. So hard -- hard to --
17 hard to know.

18 By "backwards compatibility," I
19 understand that to mean contractually agreed notice
20 periods for breaking changes. 03:55:27

21 Q. And then the next bullet is "Existing
22 integrations impacted."

23 How did the proposed changes to the
24 platform impact existing integrations?

25 A. Integrations would have been impacted by 03:55:48

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1 the proposed changes in a number of different ways, 03:55:49
2 depending on the precise purpose and design of the
3 integration.

4 Q. Okay. So it appears that when coming up
5 with this format, Facebook recognized that there 03:56:00
6 were existing integrations and they could be
7 impacted by the changes to the platform; is that a
8 fair read of that bullet?

9 MR. DAVIS: Object to the form.

10 THE DEPONENT: The -- there was 03:56:13
11 expectation at the time that the proposed changes
12 would impact some existing integrations.

13 Q. (By Mr. Loeser) And then the next bullet
14 is "Future integrations in planning."

15 That would refer to integrations that had 03:56:30
16 not yet happened, but that Facebook was perhaps
17 considering doing in the future?

18 A. I don't want to speculate as to exactly
19 what Jackie meant. Maybe -- maybe -- maybe ask
20 her. But -- so, yeah, I think maybe ask her. 03:56:46

21 Q. Okay. She'd probably be the best person
22 to ask about what she wrote in an email?

23 A. I think she'd be the best person to ask
24 about what she wrote in an email.

25 Q. If you look at the next -- next heading, 03:57:02

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1 it's "Risk Assessment Tab." And the first item on 03:57:04
2 that list is "PR risk: Potential partners/cases
3 that may cause negative press."

4 And can you tell me, from Facebook's
5 perspective, what this refers to in the context of 03:57:17
6 a discussion of the introduction of platform 3?

7 MR. DAVIS: Object to the form.

8 THE DEPONENT: It's hard to answer that
9 from Facebook's perspective. I can answer it from
10 a personal perspective. 03:57:37

11 My understanding of that is that there
12 may have been a number of companies, developers
13 that, when impacted by these changes would --
14 which --

15 (Brief interruption.) 03:57:55

16 THE DEPONENT: -- potentially be publicly
17 vocal about the impact on their integration.

18 Q. (By Mr. Loeser) Okay. And then let's
19 look at the next bullet.

20 It says "Strategic Value: Key 03:58:09
21 integrations that use read stream or friend data
22 and drive value to fb. Should decide if we allow
23 certain use cases that are of strategic value to
24 fb."

25 Did I read that correctly? 03:58:24

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1 A. I think you read that correctly, yeah. 03:58:25

2 Q. And so based on this, it appears that one
3 of the considerations for deciding how to -- or
4 whether to continue to allow access to read stream
5 or friend data is the strategic value of the 03:58:43
6 partner to Facebook, correct?

7 MR. DAVIS: Objection. Form. And scope.

8 THE DEPONENT: I wouldn't say that's
9 correct. This is a document containing the
10 opinions and ideas of a specific partner manager 03:59:01
11 around nine months before the -- the changes
12 were -- were introduced. This doesn't, I think,
13 reflect on ultimately how decisions were made.

14 Q. (By Mr. Loeser) What -- what is -- what
15 is strategic value? 03:59:19

16 What is meant by that?

17 A. I don't think I can answer what -- what
18 Jackie meant by strategic value in -- in her email.
19 I think that would be a question for her.

20 Q. And -- and what does Facebook mean by 03:59:32
21 strategic value?

22 A. I think strategic value could be
23 construed to mean many different things. I don't
24 think this is specific -- Facebook does not have a
25 specific definition of what strategic value means. 03:59:46

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1 Q. So Ms. Chang writes "Should decide if we 03:59:48
2 allow certain use cases that are of strategic value
3 to fb."

4 And so can you tell me, from Facebook's
5 perspective, what does it mean for a use case to be 03:59:59
6 of strategic value to Facebook?

7 MR. DAVIS: Objection. Form. And scope.

8 THE DEPONENT: I can't give a -- a
9 company answer to -- to -- to that question.

10 As -- as I testified earlier, I think 04:00:10
11 there's a wide range of things that may be or could
12 be considered strategic value.

13 Q. (By Mr. Loeser) Okay. So what are some
14 of the things that may make sense in -- in the
15 context of this email string? 04:00:21

16 MR. DAVIS: Objection. Form. And scope.

17 THE DEPONENT: I -- I can't answer on
18 behalf of the company relative -- relative to what
19 a partner manager was writing in an email nine
20 years ago. So I think it's hard to answer that 04:00:38
21 question.

22 Q. (By Mr. Loeser) So Facebook does not
23 have an understanding of what it means for a
24 partner to have strategic value to Facebook?

25 MR. DAVIS: Objection. Form. And scope. 04:00:50

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1 THE DEPONENT: There's not a standard 04:00:53
2 company definition for what construes strategic
3 value.

4 Q. (By Mr. Loeser) And -- and you're not
5 prepared to testify as Facebook's -- as Facebook's 04:01:00
6 representative or designee to testify about what
7 strategic value means to Facebook in the context of
8 its partners?

9 MR. DAVIS: Objection. Form.

10 THE DEPONENT: I could give some 04:01:19
11 examples, per se, that might be considered
12 valuable. But I can't give you, as you're asking,
13 some kind of universal definition of what strategic
14 value is to -- to Facebook.

15 Q. (By Mr. Loeser) What are the examples 04:01:37
16 that you're thinking about?

17 A. So one example might be a mobile device
18 integration to enable a Facebook-branded
19 application to exist on a mobile operating system.

20 Q. Are there other examples? 04:01:59

21 A. There are probably other examples. I
22 don't have any in my head immediately to mind.

23 Q. So you're not prepared to testify, on
24 behalf of Facebook, as to other examples of what
25 strategic value means to Facebook in this context? 04:02:21

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1 MR. DAVIS: Objection. Form. And scope. 04:02:24

2 THE DEPONENT: Well, I mean, be prepared

3 to testify, I -- you know, I think I could give

4 some more examples -- another example if I had a

5 bit more time to think of one. 04:02:39

6 Q. (By Mr. Loeser) What -- what does it

7 mean to drive value to Facebook -- for a partner to

8 drive value to Facebook?

9 MR. DAVIS: Objection. Form. And scope.

10 THE DEPONENT: In the context of -- can 04:02:51

11 you help me understand the context in which you're

12 asking.

13 Q. (By Mr. Loeser) Sure.

14 In the context of Jackie Chang's proposed

15 format for how to decide which partners should 04:02:59

16 receive continued access to friend permissions.

17 MR. DAVIS: Same objections.

18 THE DEPONENT: Yeah. I think drive value

19 to Facebook -- I mean, I think if you want to

20 understand what she meant by that phrase in an 04:03:12

21 email, you should ask Jackie.

22 Q. (By Mr. Loeser) But Facebook doesn't

23 have an answer to that question?

24 MR. DAVIS: Objection. Form. Scope.

25 THE DEPONENT: As I've said, there's a 04:03:28

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1 number of different ways which might be considered 04:03:29

2 drive -- drive value in this -- in this context.

3 Q. (By Mr. Loeser) If you look at the next

4 bullet in Ms. Chang's email, she writes

5 "Competitive/Not Useful to FB: Key integrations 04:03:52

6 that are competitive or drive little value to fb.

7 Good that we're removing, but may need some

8 additional considerations on wind-down time."

9 Do you understand what she's referring to

10 here? 04:04:08

11 A. I don't understand what she's -- well, I

12 don't understand -- I can't be sure what she's

13 referring to here.

14 Q. What would it mean for a key integration

15 that is competitive or drives little value to 04:04:23

16 Facebook?

17 MR. DAVIS: Objection. Form. Scope.

18 THE DEPONENT: So hard to give a company

19 answer to that question.

20 On a personal level, one example that 04:04:34

21 might come to mind is where a user might be able to

22 browse their newsfeed in another -- on another

23 platform or -- or app in another application,

24 which -- which meant the user would be browsing

25 their newsfeed in a non-Facebook app. 04:05:05

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1 that had been proposed by Jackie Chang? 04:10:22

2 MR. DAVIS: Objection. Form.

3 THE DEPONENT: I think the context,

4 again, of this email is important. This is a -- a

5 team of people, nine months before changes were 04:10:32

6 announced, attempting to find some way to structure

7 their thinking.

8 In this email, he's referring to,

9 you know, Jackie's framework. But it's not clear

10 to me what Jackie's framework is. And it's also 04:10:52

11 not clear whether or not any of this was ultimately

12 used.

13 Q. (By Mr. Loeser) Okay. Well, let's go up

14 to the top of KP's email.

15 He says "Thanks a lot, Jackie. This is 04:11:05

16 great - I have included the additional info for the

17 strategic partners in the attached spreadsheet as

18 well (for completeness)."

19 Do you see that?

20 A. I do see that. 04:11:19

21 Q. So he received a format from Jackie,

22 right?

23 MR. DAVIS: Objection. Form.

24 THE DEPONENT: I mean, all I have to go

25 on to answer your questions is what -- what's on 04:11:28

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1 the screen here. 04:11:30

2 I think Jackie or KP need to answer the
3 specifics.

4 Q. (By Mr. Loeser) And you can confirm, on
5 behalf of Facebook, that in this email KP 04:11:41
6 recommended using Jackie's framework for the
7 category described in KP's email as strategic,
8 right?

9 MR. DAVIS: Objection. Form.

10 THE DEPONENT: I can confirm this email 04:11:54
11 exists. Sorry. I can confirm that this document
12 exist.

13 But like I can't confirm anything about
14 the precise nature of a framework or if that was
15 used in any way. 04:12:10

16 Q. (By Mr. Loeser) Right.
17 And I asked you a slightly different
18 question.

19 It was, can you confirm that KP
20 recommended the use of Jackie's framework? 04:12:17

21 MR. DAVIS: Objection. Form.

22 THE DEPONENT: Again, all I have to go on
23 is what's on the page here. So I would be
24 confirming -- confirming what we all can read with
25 our own eyes. I can't confirm, on behalf of 04:12:33

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1 Facebook, anything more than that. 04:12:37

2 Q. (By Mr. Loeser) And so if Facebook
3 wanted to figure out if Jackie's framework was
4 used, what would Facebook do to identify the answer
5 to that? 04:12:45

6 MR. DAVIS: Objection. Form.

7 THE DEPONENT: You want me to stand by
8 what you mean by Jackie's framework was used.

9 Q. (By Mr. Loeser) Well, is there something
10 confusing about that statement? 04:12:55

11 A. Yes.

12 Q. Okay. Well, let's break it down.

13 There's a framework discussed in this
14 email, right?

15 A. There's the -- there's a framework 04:13:11
16 discussed. But it's not clear to me exactly what
17 that framework is.

18 Q. Okay. But there is a framework that's
19 indicated in Jackie's email to Ime Archibong,
20 right? 04:13:27

21 MS. DAVIS: Objection. Form.

22 THE DEPONENT: She doesn't make a
23 reference to a framework.

24 Q. (By Mr. Loeser) If you go back to the
25 heading we were looking at, No. 3, KP refers to 04:13:52

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1 "Jackie's framework," right? 04:13:56

2 A. I can see the term here use -- "User
3 Jackie's framework." I can read that on the page.

4 Q. Okay. And at the beginning of this
5 string is a -- is a description of how to bucket 04:14:06
6 different partners, based upon the types of
7 agreement they had, the impact and the risk
8 assessment; is that right?

9 MR. DAVIS: Objection. Form.

10 THE DEPONENT: As we've discussed, 04:14:28
11 there's a set of bullets on this page and a link to
12 a document. I'm not sure I construe that as a
13 framework.

14 Q. (By Mr. Loeser) Okay. It appears that
15 KP referred to it as a framework, right? 04:14:39

16 A. When he's referring to Jackie's
17 framework, technically he could be referring to
18 something else. He could be referring to this.

19 It's hard to know. This is an email
20 thread from nine years ago. And if you want to 04:14:51
21 know what these people meant, I would ask them.

22 Q. Well, why don't we look at the end of
23 KP's email, and he writes, "As a general note, I
24 think we need to carry on with this exercise to
25 figure out if there are more apps falling under 04:15:19

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1 different verticals that we have not identified 04:15:21
2 yet, before we can make a decision for all the apps
3 in this vertical. For both the Newsfeed and the
4 Friends permission audit, we can use Jackie's
5 framework to assess KEEP/REMOVE for those partner 04:15:32
6 falling under the Strategic tabs and then make up a
7 decision based on the criteria outlined by Jackie
8 below."

9 Do you see that?

10 A. I read -- I see it on the page. 04:15:44

11 Q. So it seems pretty clear that KP is
12 referring to the framework that Jackie presented
13 below, right?

14 MR. DAVIS: Objection. Form.

15 THE DEPONENT: Again, Jackie doesn't 04:15:55
16 refer to anything about her work as a -- as a
17 framework.

18 Q. (By Mr. Loeser) KP refers to her work as
19 a framework; is that right?

20 A. KP refers to a framework. It's not 04:16:07
21 abundantly clear if he means Jackie's work as -- as
22 evidenced below.

23 Q. Okay. So let's look again.

24 "We can use Jackie's framework to assess
25 KEEP/REMOVE for those partner falling under the 04:16:23

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1 Strategic tabs and then make up a decision based on 04:16:26
2 the criteria outlined by Jackie below."

3 Do you see that?

4 A. I see that.

5 Q. And are there criteria outlined by Jackie 04:16:35
6 below?

7 MR. DAVIS: Objection. Form.

8 THE DEPONENT: Again, like -- I can read
9 an email. If you want to understand precisely what
10 the people in it meant, I would speak to them. 04:16:50

11 Q. (By Mr. Loeser) Yeah.

12 I'm more interested in what Facebook
13 understands, based upon the work of the employees
14 tasked with trying to decide which partners would
15 continue to have access to friends permissions and 04:17:02
16 which would not.

17 So are you not prepared to testify about
18 Facebook's understanding of how those partners were
19 sorted?

20 MR. DAVIS: Objection. Form. And scope. 04:17:11

21 THE DEPONENT: I'm prepared to testify
22 that there's a group of people in a partnerships
23 team attempting to put together a way of
24 understanding how these proposed -- the -- the
25 changes proposed at the time might impact the 04:17:25

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1 that as a framework. KP refers to "a" framework. 04:20:12

2 It could be that he's talking about Jackie's work.

3 But to confirm that you'd need to speak
4 to KP or Jackie.

5 Q. (By Mr. Loeser) Okay. And the -- and 04:20:25

6 the people that were involved in the development of
7 the criteria used to sort partners for deciding who
8 would have access to friend permissions were

9 Chris Daniels, Ime Archibong, KP, Jackie Chang and
10 yourself? 04:20:43

11 MR. DAVIS: Objection. Form.

12 THE DEPONENT: This document represents

13 an email thread with some people on it having

14 that -- having a discussion about how to

15 potentially categorize apps that might be affected 04:20:55

16 by the deprecation.

17 Q. (By Mr. Loeser) And, sir, who made the

18 final decision on the framework for -- to be used

19 for determining which apps or partners would

20 continue to have access to deprecated permission, 04:21:09

21 such as friend sharing?

22 MR. DAVIS: Objection. Form.

23 THE DEPONENT: I'm not sure how to answer

24 that question. Yeah. I'm not sure how to answer

25 that question on behalf of the company. 04:21:25

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